

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a
COUNCIL ON AMERICAN-ISLAMIC
RELATIONS, & CAIR,

Plaintiff,

v.

LORI SAROYA,

Defendant.

Civil No.: 0:21-cv-01267 (SRN/TNL)

**DECLARATION OF
STEVEN C. KERBAUGH IN
SUPPORT OF DEFENDANT LORI
SAROYA'S MOTION FOR AN
ORDER COMPELLING PLAINTIFF
TO ANSWER INTERROGATORIES**

I, Steven C. Kerbaugh, hereby state and declare under penalty of perjury:

1. I am an attorney with the law firm Saul Ewing Arnstein & Lehr, LLP. I am one of the attorneys representing Defendant Lori Saroya ("Saroya"). The following is true and correct to be the best of my knowledge, information and belief.

2. Attached hereto are true and correct copies of the following:

Exhibit A Lori Saroya's First Set of Interrogatories to CAIR Foundation, Inc. dated August 23, 2021;

Exhibit B Plaintiff's Responses and Objections to Lori Saroya's First Set of Interrogatories to CAIR Foundation, Inc. dated September 22, 2021;

Exhibit C Letter of Steven C. Kerbaugh to Carl E. Christensen, Michael J. Fortunato and Cynthia B. Morgan dated October 4, 2021; and

Exhibit D Letter of Cynthia B. Morgan to Steven Kerbaugh dated October 18, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 3, 2021

s/Steven C. Kerbaugh

Steven C. Kerbaugh